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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GOLDEN ENTERTAINMENT, INC.,
Plaintiff,

vs.

FACTORY MUTUAL INSURANCE
COMPANY,
Defendant.

Case No.: 2:21-cv-00969-APG-EJY

**STIPULATION TO CONTINUE (1) THE
FILING DATES FOR FACTORY MUTUAL
INSURANCE COMPANY'S MOTION TO
DISMISS AND CORRESPONDING
RESPONSES, AND (2) THE DEADLINE
FOR FACTORY MUTUAL INSURANCE
COMPANY TO PRODUCE CERTAIN
DOCUMENTS ORDERED BY THE COURT
(FIRST REQUEST)**

Inasmuch as defendant Factory Mutual Insurance Company ("FMIC") has advised plaintiff Golden Entertainment, Inc. ("Golden") that it needs additional time to complete its production of certain documents and associated privilege log(s) as ordered by the Court at the February 6, 2024 hearing on FMIC's Motion for Protective Order (see ECF No. 106 (Transcript of Proceedings dated February 6, 2024 (held to be the Order of the Court) at 40-56), and the parties wish to work

1 cooperatively to schedule the production deadline so that it falls 14 days prior to the deadline for
2 FMIC to file a responsive pleading to Golden's Second Amended and Supplemental Complaint
3 ("SAC"), and inasmuch as FMIC intends to file a motion to dismiss the SAC, the parties, by and
4 through their respective counsel of record, hereby stipulate as follows:

5 WHEREAS, the current deadline for FMIC to complete its document production is March
6 22, 2024 (ECF No. 106 at 55);

7 WHEREAS, the current deadline for FMIC to file its renewed motion to dismiss is April
8 5, 2024 (ECF No. 104 at 9);

9 WHEREAS, the current deadline for Golden to file its response to FMIC's renewed motion
10 to dismiss is April 26, 2024 (*Id.*);

11 WHEREAS, the current deadline for FMIC to file its reply to Golden's response is May
12 10, 2024 (*Id.*);

13 WHEREAS, FMIC has made six additional productions since the February 6, 2024
14 hearing;

15 WHEREAS, counsel for FMIC represents that it has been diligent in identifying, reviewing
16 and producing the documents ordered by the Court for production at the February 6, 2024 hearing,
17 but needs additional time to complete that production, including any associated privilege logs;

18 WHEREAS, the firm of Jones Turner, LLP, counsel for FMIC, consists of three attorneys,
19 only two of which are assigned to work on this case given the firm's workload and other pending
20 matters;

21 WHEREAS, at the February 6, 2024 hearing, the Court invited the parties to seek the
22 Court's assistance with any problems that might arise regarding the production (ECF No. 106 at
23 56);

24 WHEREAS, Golden and FMIC agree that it would be in the interests of the parties and this
25 Court to continue FMIC's production deadline by 30 days, up to and including April 23, 2024 and
26 to continue FMIC's filing date for its renewed motion to dismiss to May 7, 2024 (thus allowing a
27 two-week window for Golden to review FMIC's completed production prior to filing of the
28 renewed motion to dismiss); and

1 WHEREAS, this is the first stipulation for an extension of time to complete the production
2 of documents pursuant to the Court's February 6, 2024 ruling and the second stipulation for an
3 extension of time for FMIC to file its renewed motion to dismiss;

4 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties that:

- 5 1. FMIC's production of documents, and any associated privilege logs, pursuant to the
6 Court's February 6, 2024 ruling shall be completed on or before **April 23, 2024**; and
- 7 2. FMIC's new filing deadline for its renewed motion to dismiss is **May 7, 2024**.
- 8 3. Golden's response to such motion is due **May 29, 2024**.
- 9 4. FMIC's reply is due on **June 12, 2024**.

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1 Dated: March 18, 2024

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Factory Mutual Insurance Company

23 **IT IS SO ORDERED:**

24 

25 **UNITED STATES MAGISTRATE JUDGE**

26 **Dated: March 18, 2024**